

**VERMONT SECRETARY OF STATE****Corporations Division**

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: www.sec.state.vt.us**1. Acknowledgement Information.**

- a. **Name:** Lisa Gallerano
- b. **Acknowledgement Address:** General Counsel Epsilon, 6021 Connection Drive, Irving, TX, 75039, USA
- c. **Email Address:** Lisa.Gallerano@epsilon.com
- d. **Phone No:** (469) 262-0860

2. Data Broker Information.

- a. **Name:** Epsilon Data Management, LLC
- b. **Primary Physical Address:** 6021 Connection Drive, Irving, TX, 75039, USA
- c. **Primary Email Address:** privacy@epsilon.com
- d. **Primary Internet Address (URL):** <https://us.epsilon.com>

3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? ☒ Yes ☐ No*If so:***a. What was the method for requesting an opt-out?**

Document with full response to all questions is being emailed separately to Koren Steventon today.

b. If the opt-out applied to only certain activities or sales, which ones?

Document with full response to all questions is being emailed separately to Koren Steventon today.

c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?

Due to privacy concerns, Epsilon does not accept or process any third-party opt-out requests, with the exception of the national Data & Marketing Association Pander file. If a consumer moves or changes his name after opting out of an Epsilon database, he/she will need to opt out again from such database as set forth above by providing his/her new name and/or address.

4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:

Document with full response to all questions is being emailed separately to Koren Steventon today.

5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:

Epsilon is committed to being a thoughtful steward of the data with which it is entrusted. From Epsilon's perspective, a key element of stewardship is knowing who its clients are and the kinds of content they direct to consumers. Accordingly, as part of its commitment, Epsilon has implemented a systematic approach to review background information regarding its current and potential clients and to review creative and other advertising content/offers of its current and potential clients.

6. The number of security breaches that the data broker experienced during the prior year: 0 .

Total number of consumers affected by the breaches: 0 .



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- 7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:**

Epsilon does not knowingly possess brokered personal information of minors.

- 8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:**

Epsilon offers four primary product lines. Each product line has its own source data sets. Each source data set has its own hygiene/compliance practices prior to making a record available for marketing purposes. Epsilon applies the marketing suppression files managed by the Data & Marketing Association to all four of its product lines.

- 9. Certification of Annual Registration.**

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Stacey Hawes
PRINTED NAME

Stacey Hawes
SIGNATURE

01/29/2019
DATE

1. Return Acknowledgement to (Required):

Epsilon Data Management, LLC
Attn: General Counsel
6021 Connection Drive
Irving, TX 75039

2. Data Broker Personal Information (Required):

- a. Name:** Epsilon Data Management, LLC
- b. Primary Physical Address:** 6021 Connection Drive, Irving, TX 75039
- c. Primary Email Address:** privacy@epsilon.com
- d. Primary Internet Address (URL):** <https://us.epsilon.com>

3. Does the data broker permits [sic] a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases, or opt out of certain sales of data (Required)?

A consumer may opt out of Epsilon's databases (resulting in the suppression or deletion of his/her personal information, as further described below), Epsilon's collection of his/her personal information in connection with Epsilon's Abacus™ database, and Epsilon's sale of his/her personal information.

If so:

a. What is the method for requesting an opt-out?

With respect to Epsilon's Abacus, MarketView™, Shopper's Voice®, and TotalSource Plus® databases, there are three ways a consumer may submit an opt-out request: email, postal mail, or telephone. To opt-out via email, a consumer may email his/her request to opt out, together with his/her current full name and address, to optout@epsilon.com.

A consumer may also submit his/her request to opt out, together with his/her current full name and address, via postal mail to:

Epsilon
Attention: Privacy
PO Box 1478
Broomfield, CO 80038

To opt out by telephone, a consumer may call 1 (888) 780-3869 to reach Epsilon's Consumer Privacy Specialist, provide his/her current full name and mailing address, and state his/her request to opt out of Epsilon's databases.

b. If the opt-out applies to only certain activities or sales, which ones (Required)?

For the Abacus database, an opt out through any of the three aforementioned channels results in a deletion of the household record name. In addition to the deletion of the household record name from the database, the household record name is also added to a suppression file. This external suppression file prevents the name from being re-introduced to the Abacus database in future updates.

For the MarketView, Shopper's Voice, and TotalSource Plus databases, an opt out through any of the three aforementioned channels does not result in the deletion of the individual's name from the databases. Rather, the individual's name is added to a suppression file to prevent it from being sold to marketers in the future.

A consumer must specifically opt out of the Abacus database and the Shopper's Voice database separately. If a consumer opts out of the Shopper's Voice or Abacus database, he/she is automatically opted out of the TotalSource Plus database due to the linkage between Epsilon's databases. Similarly, if a consumer opts out of the TotalSource Plus database, he/she will automatically be opted out of the MarketView database.

c. Does the data broker permits [sic] a consumer to authorize a third party to perform the opt-out on the consumer's behalf (Required)?

Due to privacy concerns, Epsilon does not accept or process any third-party opt-out requests, with the exception of the national Data & Marketing Association Pander file. If a consumer moves or changes his name after opting out of an Epsilon database, he/she will need to opt out again from such database as set forth above by providing his/her new name and/or address.

4. Statement specifying the data collection, databases, or sales activities from which a consumer may not opt out (Required):

Data Collection

Due to the nature of Epsilon's data collection, Epsilon cannot control the records that are present on the data files received by Epsilon for compilation. Epsilon maintains suppression files of opt-out requesters in order to prevent records pertaining to such individuals from being re-introduced into Epsilon's databases.

Databases

Epsilon does not maintain databases from which a consumer may not opt out.

Sales Activities

By opting out of an Epsilon database, a consumer's name and corresponding brokered personal information is designated as "Consumer Suppression" for the respective database, and will subsequently not be sold by Epsilon to marketers.

5. Statement regarding whether the data broker implements a purchaser credentialing process (Required):

Epsilon is committed to being a thoughtful steward of the data with which it is entrusted. From Epsilon's perspective, a key element of stewardship is knowing who its clients are and the kinds of content they direct to consumers. Accordingly, as part of its commitment, Epsilon has implemented a systematic approach to review background information regarding its current and potential clients and to review creative and other advertising content/offers of its current and potential clients.

6. a. The number of security breaches that the data broker has experienced during the prior year (Required):

Epsilon did not experience a security breach during the prior 12 months.

6 b. If known, the total number of Vermont residents affected by the breaches (Required):

None.

7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors (Required):

Epsilon does not knowingly possess brokered personal information of minors.

8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices (Optional):

Epsilon offers four primary product lines. Each product line has its own source data sets. Each source data set has its own hygiene/compliance practices prior to making a record available for marketing purposes. Epsilon applies the marketing suppression files managed by the Data & Marketing Association to all four of its product lines.